

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

Lordstown Motors Corp, *et al.*,<sup>1</sup>  
Debtors.

Chapter 11

Case No. 23-10831 (MFW)  
(Jointly Administered)

**CERTIFICATION OF COUNSEL REGARDING  
ORDER SCHEDULING OMNIBUS HEARING DATE**

The undersigned proposed co-counsel to the debtors and debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), hereby certifies that they have consulted with the Court regarding scheduling an omnibus hearing date for the Chapter 11 Cases and has been informed that the following date and time is available for an omnibus hearing in the Chapter 11 Cases:

**December 19, 2023 at 2:00 p.m. (Eastern Time)**

WHEREFORE, the Debtors respectfully request that, pursuant to rule 2002-1(a) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, the Court enter the proposed omnibus hearing date scheduling order, substantially in the form attached hereto as **Exhibit A**, at its earliest convenience.

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

Dated: November 1, 2023  
Wilmington, Delaware

Respectfully submitted,

<p><u>/s/ Morgan L. Patterson</u></p> <p><b>WOMBLE BOND DICKINSON (US) LLP</b> Donald J. Detweiler (DE Bar No. 3087) Morgan L. Patterson (DE Bar No. 5388) 1313 North Market Street, Suite 1200 Wilmington, Delaware 19801 Telephone: (302) 252-4320 Facsimile: (302) 252-4330 <a href="mailto:don.detweiler@wbd-us.com">don.detweiler@wbd-us.com</a> <a href="mailto:morgan.patterson@wbd-us.com">morgan.patterson@wbd-us.com</a></p> <p><i>Proposed Counsel to the Debtors and Debtors in Possession</i></p>	<p><b>WHITE &amp; CASE LLP</b> Thomas E Lauria (admitted <i>pro hac vice</i>) Matthew C. Brown (admitted <i>pro hac vice</i>) Fan B. He (admitted <i>pro hac vice</i>) 200 South Biscayne Boulevard, Suite 4900 Miami, FL 33131 Telephone: (305) 371-2700 <a href="mailto:tlauria@whitecase.com">tlauria@whitecase.com</a> <a href="mailto:mbrown@whitecase.com">mbrown@whitecase.com</a> <a href="mailto:fhe@whitecase.com">fhe@whitecase.com</a></p> <p>David M. Turetsky (admitted <i>pro hac vice</i>) 1221 Avenue of the Americas New York, NY 10020 Telephone: (212) 819-8200 <a href="mailto:david.turetsky@whitecase.com">david.turetsky@whitecase.com</a></p> <p>Jason N. Zakia (admitted <i>pro hac vice</i>) 111 South Wacker Drive, Suite 5100 Chicago, IL 60606 Telephone: (312) 881-5400 <a href="mailto:jzakia@whitecase.com">jzakia@whitecase.com</a></p> <p>Roberto Kampfner (admitted <i>pro hac vice</i>) Doah Kim (admitted <i>pro hac vice</i>) RJ Szuba (admitted <i>pro hac vice</i>) 555 South Flower Street, Suite 2700 Los Angeles, CA 90071 Telephone: (213) 620-7700 <a href="mailto:rkampfner@whitecase.com">rkampfner@whitecase.com</a> <a href="mailto:doah.kim@whitecase.com">doah.kim@whitecase.com</a> <a href="mailto:rj.szuba@whitecase.com">rj.szuba@whitecase.com</a></p> <p><i>Co-Counsel to Debtors and Debtors in Possession</i></p>
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